



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



A:2  
1/21/99

January 21, 1999

REPLY TO THE ATTENTION OF

**VIA FACSIMILE**

Craig Skeira  
SECOR  
2205 Jolly Road  
Okemos, MI 48864

**Re: USEPA Comments on Draft Operation and Maintenance Plan**

Dear Craig:

I have the following comments on the text of the O&M plan. Mark Baker and I had previously discussed changes that would be necessary on the tables and he advised me that the changes had already been made, therefore, these comments pertain only to the text.

Section 3.2.2

Since the approved design said nothing of a dedicated low flow pump, nor inflatable packer, the text here should be revised to reflect that. The same paragraph also refers to a brand name as far as the sampling techniques that will be used. Could you just spell it out for us instead since we are unfamiliar with this companies sampling techniques.

The ROD on page 26 stated the following which I cannot see provided for in the draft O&M plan:

Also, prior to the initiation of the groundwater monitoring program, the water levels of all existing and new monitoring wells will be recorded and all wells will be sampled and analyzed, for target compound list (TCL) organics, target analyte list (TAL) inorganics, and 1,2-dibromo-3-chloropropane. These analyses will be done using methods which achieve method detection limits equal to or less than the MCL for each compound or analyte, for those which have an MCL.

Your O&M plan talks about quarterly, annual, and five year monitoring, can you show me where the above requirement is covered in this draft? I see that it is covered in section 3.2.3 but this is for the first 5 year review which will not occur until 5 years after initiation of the program.

Also on page 26, the ROD required that four new monitoring wells be installed to define further the contaminant plume to the west and south of the site and to define further the vertical extent of contamination, on order to design an effective groundwater monitoring program. These new wells have been installed, but they are not covered in your monitoring program at all. In order to

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finalize the O&M plan, we will have to get some data from these wells.

Monitoring wells 3 and 15 should have been included in the annual monitoring program as these are important, potentially downgradient wells which have in the past shown contamination with site related contaminants.

#### **Section 3.2.3 FIVE YEAR REVIEW GROUNDWATER MONITORING**

Why do you choose to put in the second paragraph in this section. It is not provided for in the ROD, nor should it be in this O&M plan. Since it deals with dropping chemicals after the first year of sampling, I really can't understand why it would even be placed in this section, but I request that you remove it from the document entirely. The MDEQ had a real problem with this and since it refers to USEPA approval anyway, lets just handle it sensibly when it comes up.

#### **Section 3.2.9 SCHEDULE AND MONITORING TERMINATION**

I request that you change the title of this section to "MONITORING SCHEDULE".

2nd paragraph - delete the words "either" and "...or be determined to be naturally occurring" from the second sentence.

Judging by the flow of this section it would seem that the 3rd paragraph should address the trigger for the contingency remedy that was in the ROD. The ROD requires that 5 years after the date on which construction of the landfill cap is complete, that a statistical test will be performed on wells in which the arsenic concentration exceeds the performance standard. The ROD also gives the specifics on how this test will be conducted. If this were any other Site, I would expect all these types of requirements to show up in the O&M plan which I have to approve. This is not addressed here and should be. Yes, you do mention the contingency trigger in the last paragraph of this section, but then you inaccurately state that this O&M plan terminates upon invocation of the contingency.

Second from last paragraph - The second sentence should read as follows to comport with the ROD: "Although the annual groundwater monitoring will end..."

Last paragraph - Delete the last sentence.

#### **Section 4.1.2 - STORMWATER CONTROL AND EROSION PROTECTION**

The schedule established here would be adequate as long as you also note that the schedule would

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be modified or even increased if there were a major rain event.

Section 4.1.3 - You give a schedule for inspection of the gas vents but not for the monitoring wells. Does this coincide with monitoring well sampling?

#### Section SIX - PERSONNEL

After the Final Inspection of the landfill cap is completed, Jon Peterson will no longer be the RPM on the project. The Site will then be the responsibility of the: POST CONSTRUCTION COMPLETION POOL / CAP-COMPLETION TEAM in the REMEDIAL RESPONSE BRANCH OF THE SUPERFUND DIVISION. This team is currently headed by Terry Roundtree, but due to staff turnover and the length of time that this O&M plan is to be in place, I suggest that you instead name the team listed above and give the general USEPA phone number: (312) 353-2000 - with the instructions to ask for the Superfund Division.

The State of Michigan wondered why you did not have a contact listed for them in the O&M plan since they are located much closer to the Site. We suggest that list the Michigan contact as:

Michigan Dept. Of Environmental Quality  
Environmental Response Division  
P.O. Box 30426  
Lansing, MI 48909

I will be back in the office on Monday the 25th and you may call me if you have any questions at (312) 353-1264.

Sincerely,

Jon Peterson, RPM  
Section #6